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6 Attorney for Defendant
7 TELUS INTERNATIONAL (U.S.) CORP.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 DAVID ISLAS, an Individual,
12 Plaintiff,

13 v.

14 TELUS INTERNATIONAL (U.S.)
CORP., a Foreign Corporation; DOES 1
15 Through 25, inclusive; and ROE
CORPORATIONS 1 Through 25,
16 inclusive,

17 Defendants.

Case No.: 2:24-cv-02230-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME FOR DEFENDANT TO
FILE RESPONSE TO PLAINTIFF'S
MOTION TO REMAND**

[FIRST REQUEST]

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19 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff DAVID ISLAS ("Plaintiff") and Defendant
20 TELUS INTERNATIONAL (U.S.) CORP. ("Defendant") by and through their undersigned
21 counsel, hereby agree and stipulate to extend the time for Defendant to file a response to Plaintiff's
22 Motion to Remand ("Motion") from the current deadline of December 31, 2024, up to and including
23 **January 7, 2025.**

24 Such extension is necessary to allow Defendant sufficient time to respond to the allegations
25 set forth in Plaintiff's Motion. Additionally, due to holiday closures, additional time is needed to
26 allow Defendant to prepare the response.

1 This is the first request for an extension of time to respond to the Motion in this Court.
2 This request is made in good faith and not for the purpose of delay.

3
4 Dated: December 31, 2024

Dated: December 31, 2024

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Paul H. Wolfram



8 PATRICK W. KANG, ESQ.
9 KYLE R. TATUM, ESQ.
10 PAUL H. WOLFRAM, ESQ.
11 KANG & ASSOCIATES, PLLC

Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON P.C.

Attorneys for Defendant
TELUS INTERNATIONAL (U.S.) CORP.

Attorney for Plaintiff
DAVID ISLAS

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13 **IT IS SO ORDERED.**

14 Dated: 1/3/2025

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18 Hon. Maximiliano D. Couvillier III
19 United States Magistrate Judge
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